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June 8, 2011

VIA ECF

Hon. Nathaniel M. Gorton
United States District Court
District of Massachusetts
John Joseph Moakley United States Courthouse
1 Courthouse Way - Suite 3110
Boston, MA 02210

Re: *Cambridge Place Investment Management Inc., v. Morgan Stanley & Co., Inc. et al.*
Civil Action No. 1:10-cv-11376-NMG

Dear Judge Gorton:

We represent the Plaintiff in the above-captioned matter. We write respectfully to request that the Court permit Plaintiff to file and serve its response to Defendants' Motion for Order to Show Cause by 12:00 p.m. on Monday, June 13, 2011, rather than by the close of business on Friday, June 10, 2011.

We received Defendants' 18-page motion this afternoon without advance notice. They apparently have been preparing this motion for some time, likely since receiving Plaintiff's written responses and objections on May 27, 2011. The motion seeks to compel production of documents in response to discovery that is substantially different than the document requests that Defendants proffered to the Court when seeking leave to obtain jurisdictional discovery. The motion raises myriad issues, mischaracterizes Plaintiff's position and production of documents in important respects and attempts to obtain sweeping discovery into the merits of the case rather than the jurisdictional discovery permitted by this Court's May 2, 2011 Order.

Given the number of issues raised in the motion, including requests that are calculated to invade the attorney-client privilege and work product protection, we respectfully request a modest extension of time -- from Friday June 10 to Monday June 13 -- to afford adequate time to respond. We are available for a hearing next week, whether before Your Honor or Magistrate Judge Dein, to address these issues. This modest extension will neither prejudice Defendants nor

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impact the deadlines previously set by the Court for supplemental briefing on Plaintiff's motion to remand.

Thank you for your attention.

Respectfully,


Michael S. D'Orsi

MSD/jlf
Enclosures

cc: All Counsel (via ECF)

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on June 8, 2011.

/s/ Michael S. D'Orsi
Michael S. D'Orsi